

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

RIMSYS, INC.,

Plaintiff,

v.

KAREN COHN,

Defendant.

Civil Action No. 2:23-cv-1630

**DEFENDANT KAREN COHN'S MOTION TO  
DISMISS PLAINTIFF RIMSYS, INC.'S COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 12, Defendant Karen Cohn ("Ms. Cohn"), by and through her undersigned counsel, files this Motion to Dismiss Plaintiff Rimsys, Inc.'s ("Rimsys") Complaint and respectfully moves the Court to dismiss Rimsys's Complaint with prejudice. In support thereof, Ms. Cohn states as follows:

1. On September 11, 2023, Rimsys commenced this action by filing a Verified Complaint and Motion for Temporary Restraining Order and Preliminary Injunction. (DE 1 and 4).
2. The Complaint was personally served on Ms. Cohn on September 12, 2023.
3. For all of the reasons set forth in Ms. Cohn's accompanying Memorandum of Law in Support of Motion to Dismiss Plaintiff Rimsys's Complaint, which is incorporated by reference, Ms. Cohn respectfully requests that the Court dismiss each of the causes of action in Rimsys's Complaint with prejudice.

WHEREFORE, for the reasons set forth above and for the reasons set forth in Ms. Cohn's Memorandum of Law in Support of Motion to Dismiss Plaintiff Rimsys's Complaint, this Court should dismiss Rimsys's Complaint with prejudice.

Dated: October 2, 2023

Respectfully submitted,

**BARNES & THORNBURG LLP**

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